

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BELLEAU TECHNOLOGIES, LLC,

Plaintiff,

v.

JOEALLENPRO LIMITED, a foreign
corporation; and JOE ALLEN, as an
individual,

Defendants.

Civil Action No. 18 Civ. 06319 (DLC)

JURY TRIAL DEMANDED

NOTICE OF MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

MOTION ON BEHALF OF:

Defendants JoeAllenPro Limited and Joe Allen, by their attorneys, Meredith & Keyhani, PLLC.

DATE, TIME AND PLACE OF HEARING:

Before the Hon. Denise L. Cote, Daniel Patrick Moynihan United States Courthouse
500 Pearl St. New York, NY 10007-1312
at a date and time to be determined by the Court.

SUPPORTING PAPERS:

Memorandum of law, Declaration of Joseph Allen.

RELIEF DEMANDED:

(1) An Order granting Defendants' motion to dismiss the case for lack of personal jurisdiction and (2) such other and further relief this Court deems just and proper.

Date: October 26, 2018

Respectfully submitted,

/s/ Dariush Keyhani
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